

# IMMIGRATION JUSTICE CAMPAIGN

## SAMPLE DIRECT EXAMINATION

Julian Ondobo Ngongbo, A # 123-456-789<sup>1</sup>

QUESTIONS	GOAL
<p><b>Identity/Big Picture</b></p> <ul style="list-style-type: none"><li>• Can you please state your name for the record?</li><li>• What is your date of birth?</li><li>• Where were you born?</li><li>• Are you a citizen of Cameroon? Are you a citizen of any additional countries besides Cameroon?</li><li>• <b>Can</b> you explain in a couple of sentences why you are seeking asylum in the United States?</li></ul>	<p>Identity</p> <p>Broadly state claim—previously arrested, imprisoned and tortured b/c of political activities and being Anglophone; afraid he'll be killed if forced to return</p>
<p><b>Childhood &amp; Joining SCNC</b></p> <ul style="list-style-type: none"><li>• Where did you spend your childhood?</li><li>• <b>You</b> mentioned earlier that you are an Anglophone. Is Tinto in an Anglophone region of Cameroon?</li><li>• What is the highest level of education that you received? Where did you go to University?</li><li>• You said that you were involved in the Southern Cameroons National Council, or SCNC. When did you become active in this group?</li></ul>	<p>Establishing Anglophone identity</p> <p>Displaying interest in SCNC mission and explaining how he became involved</p> <p>Telling the Judge about his participation at SCNC meetings beginning in 2016</p>

---

<sup>1</sup> This direct examination was created based on the Immigration Justice Campaign's fictional client, Julian Ngongbo. You can read the corresponding client declaration [here](#). Please note that direct examinations are entirely fact dependent. This sample should give you a sense of the types of questions you should ask and the sequence, but you will need to draft direct examination questions based on your client's own facts.

<ul style="list-style-type: none"> <li>• Why did you become active in SCNC?</li> <li>• What did you understand as the mission of the SCNC?</li> <li>• What did you like about that mission?</li> <li>• What, if any, types of events did you attend with SCNC?</li> </ul>	
<p><b>Police Violently Disrupting 2017 meeting</b></p> <ul style="list-style-type: none"> <li>• Did you ever have trouble because of your SCNC activities? When?</li> <li>• Can you please describe what happened during the summer of 2017 meeting?</li> <li>• What happened to the students who were arrested by the police during this meeting?</li> <li>• How did you feel after this event?</li> <li>• Did you stop participating in SCNC after this incident?</li> <li>• Why not?</li> </ul>	<p>Describing first run-in with police because of SCNC meeting</p> <p>Fellow students being beaten by police, arrested, and jailed</p> <p>Narrowly escaped but still committed to work because wanted to improve his country</p>
<p><b>Ghost Town Day Arrest, Detention &amp; Beating</b></p> <ul style="list-style-type: none"> <li>• After the summer 2017 meeting, did you have any further trouble with the police because of your SCNC activities? <ul style="list-style-type: none"> <li>- Arrested for helping to plan 2018 Ghost Town Day</li> </ul> </li> <li>• What is “Ghost Town Day?”</li> <li>• Did you have a role in planning Ghost Town Day events? What was your role?</li> <li>• Did you have any problems because of your activities with Ghost Town Day? When were you arrested? What happened?</li> <li>• Where did the police take you?</li> <li>• Can you describe the conditions at the station?</li> </ul>	<p>Demonstrating that Julian had a leadership role in planning the Ghost Town Day Events</p> <p>Police arrested Julian at his house because they knew he’d been involved in distributing flyers</p> <p>Taken to police station where he was held in dirty, crowded, unsanitary conditions</p>

<ul style="list-style-type: none"> <li>• <b>What</b> happened while you were at the police station? Were you physically harmed? Interrogated?</li> <li>• Did the police make any accusations against you while you were held at the station? What did they say?</li> <li>• Did the police transfer you anywhere else? What were the conditions like there?</li> <li>• How many days did the beatings and interrogations you've described go on for?</li> <li>• How long were you held in jail?</li> <li>• Can you please describe the process of how you got out of jail?</li> </ul>	<p>Accused of organizing Ghost Town Day and collaborating with Ambazonian fighters, threatened with going to notorious Kondengui Prion, and interrogated about political activities</p> <p>Julian should provide details of politically motivated beatings</p> <p>Detained for more than 1 week</p> <p>Describe how he escaped jail</p>
<p><b>Escape from Jail &amp; Decision to Flee</b></p> <ul style="list-style-type: none"> <li>• Where did you go when you got out of jail?</li> <li>• <b>How</b> did you feel physically? How did you feel emotionally?</li> <li>• What did you do next?</li> <li>• <b>Why</b> did you decide that you couldn't stay in Cameroon safely?</li> </ul>	<p>Forced to stay in hiding at a friend's house</p> <p>Julian was in great physical pain and very scared when released</p> <p>Learned that police were looking for him at University, his house, and his family's house &amp; restaurant. Realized it wasn't safe to stay in Cameroon</p>
<p><b>Fleeing Cameroon</b></p> <ul style="list-style-type: none"> <li>• Where did you stay while you were making plans to leave the country?</li> <li>• How did you decide where to go?</li> <li>• Did you obtain travel documents to go to the US? How?</li> <li>• Can you describe what happened on the day you fled Cameroon?</li> <li>• What, if any, safety precautions did you take when you left Cameroon?</li> </ul>	<p>Had to stay in hiding; opportunity presented itself to use a Nigerian passport with US visa</p> <p>Escaped into Nigeria using someone else's passport; then flew to the US using visa</p> <p>Told immigration officials at airport the truth and ended up detained</p>

<ul style="list-style-type: none"> <li>• What happened when you arrived in the United States?</li> </ul>	
<p><b>Fear of Return</b></p> <ul style="list-style-type: none"> <li>• Have you been in touch with anyone back home in Cameroon since you've arrived in the US? What have they told you?</li> <li>• Are you afraid to return to Cameroon?</li> <li>• What do you think would happen to you if you are forced to return to Cameroon?</li> <li>• Why would the government do these things to you?</li> </ul>	<p>Family back home say the police are still looking for them</p> <p>Fearful he will be arrested, tortured, detained, and possibly killed if returned to Cameroon because of political activities and fact that he is Anglophone</p>